

## **REMARKS**

### **I. Status of Claims**

Claims 8-20 are pending in the application. Claims 8, 14 and 15 are independent.

Claims 8-20 stand rejected under 35 USC 103(a) as allegedly being unpatentable over Okoshi (USP 6,757,598 B2) (hereinafter "Okoshi") in view of Watanabe (USP 6,285,163 B1) (hereinafter "Watanabe").

The Applicant respectfully requests reconsideration of these rejections in view of the following remarks.

### **II. Pending Claims**

Independent claims 8, 14, and 15 stand rejected under 35 USC 103(a).

The Applicant respectfully submits that claim 8 is patentable over the cited references at least because they recite, "...calculating means for calculating at least one of the difference value between the voltage value detected by the first detecting means and the estimated voltage value, and the difference value between the voltage value detected by the second detecting means and the estimated voltage value."

The Applicant respectfully submits that claim 14 is patentable over the cited references at least because it recites, "...calculating at least one of the difference value between the detected voltage value of the battery and the estimated voltage value, and the difference value between the detected voltage value on the output side of the converter and the estimated voltage value."

The Applicant respectfully submits that claim 15 is patentable over the cited references at least because it recites, "...a calculating portion which calculates at least one of the difference value between the voltage value detected by the first detector and the estimated voltage value, and the difference value between the voltage value detected by the second detector and the estimated voltage value."

Certain embodiments of the present invention monitor whether there is an abnormality in the first or second detecting means (e.g., voltage sensors 610, 420 in Fig. 2) based on a difference value between the actually detected voltage value and the estimated voltage value. In contrast to certain embodiments of the present invention, in Okoshi, all voltage values used for

monitoring the abnormality in the detecting means are actually detected voltages. For example, the actually detected voltages may be battery voltages VB, generator inverter voltages VG and drive motor inverter voltages VM (See col. 14, lines 26-62 of Okoshi). Accordingly, the Applicant respectfully submits that Okoshi does not disclose or teach using an estimated battery voltage as required by claims 8, 14, and 15.

In addition, the Applicant respectfully submits that Watanabe does not cure these deficiencies of Okoshi. Rather, Watanabe discloses monitoring whether there is an abnormality in the battery itself based on a difference value between an actually detected battery voltage and an estimated battery voltage (See col. 9, lines 29-63 of Watanabe); however, in contrast to certain embodiments of the present invention, Watanabe does not disclose monitoring whether there is an abnormality in the voltage sensor.

Further, the Applicant respectfully submits that there is no motivation to combine Okoshi and Watanabe as alleged. More specifically, Watanabe is directed to monitor the abnormality in the voltage sensor, whereas Okoshi is directed to monitor the abnormality in the battery. Therefore, it would not have been obvious for one having ordinary skill in the art to combine Watanabe with Okoshi, and further to use the estimated voltage to monitor the abnormality in the voltage sensor as alleged in the Office Action.

### III. Conclusion

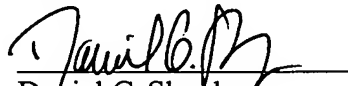
In light of the above discussion, the Applicant respectfully submits that the present application is in all aspects in allowable condition, and earnestly solicits favorable reconsideration and early issuance of a Notice of Allowance.

The Examiner is invited to contact the undersigned at (202) 220-4420 to discuss any matter concerning this application. The Office is authorized to charge any fees related to this communication to Deposit Account No. 11-0600.

Respectfully submitted,

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By:

  
Daniel G. Shanley  
Registration No. 54,863

Kenyon & Kenyon LLP  
1500 K Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 220-4200  
Facsimile: (202) 220-4201